

# EXHIBIT D

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**LEGAL EXPERIENCE**

**Class action experience**

- Lead counsel in *Fisher, et al. v. Mitsubishi Electric Corporation, et al.*, United States District Court, District of Connecticut Civil Action No. 3:09-cv-1899 RNC involving defective consumer products that resulted in tens of millions of dollars in monetary relief and warranty extensions to consumers
- Appointed to executive committee *In Re Volkswagen Timing Chain Product Liability Litigation*, United States District Court, District of New Jersey Civil Action No. 2:16-cv-2765 JLL
- *Diveroli, et al. v. Volkswagenwerk Aktiengesellschaft, et al.*, United States District Court, District of Massachusetts Civil Action No. 07-cv-10196 JLT later consolidated into *In re Volkswagen*, MDL 1790
- Other class action leadership positions involve defective consumer products including automobiles, automotive related products and electronic goods

**Non-class action experience**

- Thirty-four years of experience involving complex products liability litigation with an emphasis on automotive defects and crashworthiness proceedings
- In excess of fifteen (15) personal injury cases resulting in verdicts or settlements of more than one million dollars
- Representation of gas turbine helicopter engine manufacturer in aviation accidents involving loss of aircraft and personal injury
- Expert witness in subject matter area of automotive products liability in legal malpractice proceedings
- Qualified and testified at trial as an expert witness in the subject matter area of Porsche 911 engine design and repair procedures in Massachusetts District Court

**Legal publications and presentations**

- Co-authored papers presented at Massachusetts Continuing Legal Education products liability seminars

- Prepared course materials presented by past American Association of Justice (formerly ATLA) President at the 34th Annual Advocacy Institute

### **Automotive experience**

- Factory-trained Volvo, Honda, BMW, Mercedes-Benz and Porsche automotive technician and service manager
- Crew member of NASCAR Craftsman Truck Series and NASCAR Busch Series race teams; crew chief for SCCA Porsche 916 race team responsible for engine build and crew member on SCCA Trans-Am Pro Series team
- Knowledge of vehicle / component design and manufacture together with assembly, test and repair procedures
- Experience in automotive engine blueprinting and race preparation including designing, machining / fabricating automotive components
- Extensive motor vehicle modification and race preparation experience including turbocharging, internal engine components as well as other subassemblies including transmissions and suspension systems
- Ability to read and interpret design drawings, schematics and test protocols employing SAE and DIN standards

### **Miscellaneous**

- Professional memberships include Society of Automotive Engineers, Association for the Advancement of Automotive Medicine, Center for Auto Safety and Insurance Institute for Highway Safety
- Familiarity with National Highway Traffic Safety Administration investigation procedures, testing protocol and data bases